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Honorable Christine P. O'Hearn USDJ
United States District Court
District of New Jersey
4th and Cooper St.
Camden, New Jersey 08101

SO ORDERED this 4th day
of April 2025


United States District Judge

April 4, 2025

Re: Foley v North Wildwood City
Civil Action number 1:22-cv-03758.

Dear Judge O'Hearn:

Currently the undersign has a deadline to file a motion for summary judgment motions by April 4, 2025. respectfully request a seven day postponement until April 11, 2025. Attorney *Birchmeier* has gracefully consented to this request in the I am still not fully 100% from health issues and the case involves complicated issues.

The statement of facts which is a join effect The facts is very dense and of fact. needs to be edited. I am working with her; however, at this point, due to Denise's physical limitations and the pain she is experiencing from sitting at the desk, she would like to request a short extension. The stress working through the document has caused exacerbation of her dystonia and she needs to take frequent breaks as she is due for her cervical dystonia injections, which is adding to her pain and ability to concentrate. The legal arguments are completed.

I see no reason for any more extensions. Since the motions will be intertwined, I respectfully suggest the short postponement will not add any time to the litigation. When filed by April 11, 2025 the return date will be May 5, 2025 which is already the return date to Plaintiffs' motion to strike.

I thank you for your kind attention and please do hesitate to contact me by email or telephone.

Respectfully,


Anthony J Brady Jr.